

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Chapter 7 Estate of Bernard L.  
Madoff,

Plaintiff,

v.

ABN AMRO BANK N.V. (presently known  
as NATWEST MARKETS N.V.),

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Lead Adv. Pro. No. 10-05354 (CGM)

**STIPULATION AND ORDER TO ADJOURN HEARING**

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the estate of Bernard L. Madoff, individually, and defendant ABN AMRO Bank N.V. (presently known as NatWest Markets N.V.) (“Defendant” and collectively, with the Trustee, the “Parties”), by and through their respective, undersigned counsel, hereby stipulate and agree in this Stipulation and [Proposed] Order to Adjourn Hearing (the “Stipulation and Order”) as follows:

**WHEREAS**, on January 19, 2022, a status hearing was held and adjourned to August 10, 2022. ECF No. 216.

**WHEREAS**, on March 22, 2022, on consent by Defendant, the Trustee filed a Consolidated Second Amended Complaint (the “SAC”). ECF No. 220.

**WHEREAS**, on May 23, 2022, Defendant filed a Motion to Dismiss the SAC (“Motion”), which lists November 16, 2022 as the hearing date. ECF No. 223.

**WHEREAS**, Defendant’s Motion will be fully briefed by August 22, 2022.

**WHEREAS**, the Parties respectfully submit that, because Defendant’s Motion will not be fully briefed until August 22, 2022, it would be most efficient for the Parties and Court to adjourn the August 10, 2022 status hearing and schedule a hearing on Defendant’s Motion for November 16, 2022.

**IT IS HEREBY STIPULATED AND AGREED** that:

1. The August 10, 2022 status hearing is adjourned and a hearing on Defendant’s Motion is scheduled for November 16, 2022.
2. The above adjournment granted by this Stipulation and Order is without prejudice to either party seeking future extensions of time.
3. This Stipulation and Order may be executed in counterparts and original signatures are not required as copies or facsimile of executed counterparts of this Stipulation and Order are deemed as original and binding.

Dated: August 2, 2022  
New York, New York

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*Attorneys for Defendant ABN AMRO Bank N.V.  
(presently known as NatWest Markets N.V.)*

*Attorneys for Plaintiff Irving H. Picard,  
Trustee for the Substantively Consolidated  
SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Chapter  
7 Estate of Bernard L. Madoff*

**SO ORDERED.**

**Dated: August 4, 2022  
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris  
U.S. Bankruptcy Judge**